

No. PD-0439-16

ROBERT RODRIGUEZ

VS.

STATE OF TEXAS

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IN THE COURT OF
CRIMINAL APPEALS
OF TEXAS

FILED
COURT OF CRIMINAL APPEALS
11/22/2016
ABEL ACOSTA, CLERK

MOTION TO EXTEND TIME TO FILE BRIEF

TO THE HONORABLE JUDGES OF SAID COURT:

Now comes ROBERT RODRIGUEZ, Appellant in the above styled and numbered cause, and moves for an extension of time to file his brief.

The brief was due on November 14, 2016. Appellant respectfully requests an extension of time to November 28, 2016. Counsel has put significant time into the preparation of this brief, but needs a short extension to flesh out the complex issues involved, and to best put her client's interest forward. Counsel is cognizant of the importance of timely submissions, but this is admittedly a difficult brief to write, in that the issues involved are complex and require additional time. Each day since the due date counsel has been working furiously to get the brief completed and filed, only to run into difficulty drafting a cogent argument. The brief will be filed with no more delays after working through the Thanksgiving break, on November 28, 2016.

WHEREFORE, PREMISES CONSIDERED, appellant respectfully requests an extension until November 28, 2016 to file the brief in this cause.

Respectfully submitted,
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CERTIFICATE OF SERVICE

This is to certify that on November 22, 2016, a true and correct copy of the above and foregoing document was served on the District Attorney's Office, Guadalupe County, Texas, and on the State Prosecuting Attorney by efile/efile service.

/s/ Susan Schoon
Susan Schoon